

EXHIBIT 2

CAMP LEJEUNE JUSTICE ACT LITIGATION
REBUTTAL REPORT OF KYLE LONGLEY

This report reflects my review of the report submitted by Dr. Brigham for the Defendant dated December 9, 2024 (the “Brigham Report”). For relevant background on myself, see my prior report dated December 7, 2024 (the “12/7/24 Report”). For purposes of this rebuttal report, I relied on my 12/7/24 Report, along with additional investigation, research and analysis as discussed below and as cited in my supplemental Reliance List.

The Brigham Report does not provide adequate detail on important topics of life on the base. For example, the report does not include statements from veterans or other living survivors who lived at the base during pertinent times. By comparison, I have reported anecdotal details recalled by living individuals who formerly spent time at Camp Lejeune during the pertinent 1950s to 1980s period. First-person accounts assist to paint a fuller picture of life on the base as it related to water (e.g., swimming pools; activities that drew residents of outlying areas to Hadnot Point; barracks; showers; mess hall steam; family living; Tarawa Terrace base housing; etc.).

Relatedly, the Brigham Report often presents broad characterizations or cites demonstrably incomplete information. These narrow or incomplete statements reflect a lack of an understanding of, or a willingness to acknowledge evidence of, the broader human context when it is harmful to the Defendant’s position on the merits. There is an absence of citation to the full range of sources that tell the full story of life on a U.S. military base such as Lejeune. The report only has a cursory review of the facts of actual life on the base.

The Brigham Report relies significantly on selected Completion Reports without examining other important documents such as Command Chronologies. It also relies on snippets isolated from back issues of the *Globe*, the Camp Lejeune weekly newspaper in publication since the 1940s, without accounting for offsetting information available if one only bothered to turn the page. This methodological bias reflects cherry-picking to support particular assertions.¹

The report lacks any witness statements or citations to support its efforts to portray the outlying areas as being isolated from Hadnot Point. The report inaccurately casts Marines and family members as staying where they slept, affixed like a dot on a map.

The report also fails to account for information indicating that water buffaloes routinely picked up water from the Hadnot Point industrial area and took it all over the base (and even off-base), and other information on water buffaloes.

It is important to compare the details of the facilities at the outlying areas as compared to the facilities at Hadnot Point. For example, club- and bar-type facilities at Hadnot Point were vibrant with social life, relaxation, and other opportunities going far beyond what facilities at outlying areas like New River or Courthouse Bay could provide.

¹ Other important sources such as *Leatherneck* also delivered relevant stories about the base during the pertinent times (back issues are available at the Marine Corps Library at Quantico). See further discussion of back issue of *Leatherneck* below.

As described in my 12/7/24 Report, residents at the base were not historically siloed at one point on the base geography. Rather, Camp Lejeune was an active base that required people to travel all over it, all the time, both to work and to continue preparing for deployments, and for other uses.

It is not clear that the Brigham Report author spent time aboard the base. A personal tour of the base helps to gain an understanding of issues such as distances between different parts on the base and where key facilities and landmarks fall. A map of the base in the abstract fails to impart a full comprehension of the topic, as I know first-hand from my visit to the base with retired Master Sergeant J.M. Ensminger (USMC, Ret.). He spent many years aboard the base. His extensive knowledge has served to educate me on historical details. It better allows me to draw relevant comparisons between Camp Lejeune and other bases I have visited over the years.

The Brigham Report bases assumptions on Marine-authored secondary sources and reports supported only selectively by other sources and media such as historically preserved stories from the *Globe*. The report fails to offer any first-person accounts of people who lived there during the period under examination. The report lacks first-person accounts from persons who lived at Hadnot or at areas such as Camp Johnson, Onslow Beach, Courthouse Bay, the Rifle Range, or Camp Geiger. These accounts are vital for a full understanding of these populations.

I challenge the assertion that people generally remained isolated from the contaminated water while living and working aboard the base. There is an absence in the Brigham Report of eyewitness testimony to show that personnel who lived in the so-called “outlying camps” remained confined there with little interaction with other parts of the base, including Hadnot Point. The Brigham Report ignores historical magazines and journalism providing useful insight. For example, the magazine *Leatherneck* over many years delivered relevant stories about the base.² A review of archived issues of *Leatherneck* assists to provide a fuller picture. A cover story on Camp Lejeune featured in an April 1955 issue of the magazine reflects how even by then, there were extensive facilities located at Hadnot Point, and the article fully supports my assertion in my 12/7/24 Report that Hadnot Point was central to the base, like a city:

From the air, Camp Lejeune looks like a small city surrounded by suburbs. Hadnot Point, with its many barracks and huge industrial area, is the “city” while Courthouse Bay, Montford Point, Petersfield Point, Paradise Point, The Rifle Range, Camp Geiger, Midway Park, Tarawa Terraces +1 and +2, and Camp Knox make up the “suburbs.”³

The *Leatherneck* article goes on to describe – just like my original report -- how the base was intentionally designed so as to encourage its Marines and others to stay on the base and head to the central “city” of Hadnot Point for activities, rather than leaving the base for off-base locations like Jacksonville:

The biggest complaints come from men who expected to find good liberty towns like Washington, Chicago or New York within easy commuting distance. They’re

² See, e.g., *Leatherneck*, April 1955, issue available at https://archive.org/details/sim_leatherneck_1955-04_38_4. Back issues are available at the Marine Corps Library at Quantico, and some are available online.

³ *Leatherneck* issue dated April 1955.

disappointed. The sleepy little town of Jacksonville, North Carolina is the closest city. In 1940, it had 984 people. In 1950, this figure had swelled to 3930 and the city clerk of Jacksonville conservatively estimates the 1955 population as being more than 10,000. Nevertheless, the city has grown as a result of Camp Lejeune being nearby, not because it was nearby. Unfortunately, it has little to offer a Marine on liberty.

This fact is recognized by Major General Alfred H. Noble, Commanding General of Camp Lejeune, as it has been in the past by his predecessors. Consequently, many kinds of recreation are provided for the Marines at Camp Lejeune. There are 14 theaters located throughout the Camp, one of which is a modern drive-in theater which can accommodate 500 cars for each showing. Each area has a service club and there are facilities at Camp Lejeune that make swimming a year-around sport. Two 18-hole golf courses, a driving range and three putting greens have been laid out on the reservation....

Athletics weren't neglected at Camp Lejeune either and the base is literally dotted with various types of athletic fields. One innovation started at Camp Lejeune has been "dependent's athletics" where the offspring of Marines stationed at the Camp are taught boxing, baseball, basketball and even compete in their own intramural program.

Everything possible is done at Camp Lejeune to make a Marine's free time enjoyable. Name bands appear regularly at the base for dancing and one of the latest innovations is Camp Lejeune's own radio station. Under the call letters of WCLR, this non-commercial, public service station is confined, in range, to the base itself and is manned by seven enlisted Marines. It first went on the air in November 1954, and has been broadcasting during the daylight hours ever since WCLR beams music and timely information to specific units from their headquarters.

From a humble beginning of 1000 tents, 14 years ago, to the huge multimillion dollar installation it is today, Camp Lejeune now offers its Marines good duty and comfortable living on one of the world's most carefully planned military reservations.⁴

This 1955 magazine issue also provides details on some of the dining, social and entertainment options at Hadnot Point. It describes how "[t]he Hadnot Point Staff NCO Club's Mirror Room is one of the plushest niteries in the Corps." The author relates how "Camp Lejeune's supper beanery is the Chinese Room, hidden behind the camp cafeteria in the Industrial Area. The menu naturally announces Oriental dishes, but American food is also served."⁵ The magazine issue also provides a photo showing the large mess hall facilities (which had steam and water):

⁴ Leatherneck, April 1955, https://archive.org/details/sim_leatherneck_1955-04_38_4.

⁵ Leatherneck, April 1955, p. 27.



Mess hall photo from *Leatherneck*, April 1955.

Similarly, an inspection of back issues of the *Globe* reveals the existence of vibrant and interconnected base-wide activities, unaccounted-for by Brigham, yet essential for a historical understanding. For example, a review of the back issues (including issues cited by Brigham) reveals at least 1-2 pages of year-round intramural sports coverage per weekly issue. These articles reflect how there was a robust intramural sports program with practices and games routinely offered and held at Hadnot Point.

Brigham's contention that people "had lengthy travel distances to Hadnot Point/Mainside and/or were isolated from Mainside" (Brigham Report p. 2) and therefore only used services in their locations does not correspond to the factual data available. Materials such as the *Globe*, *Leatherneck*, command chronologies, depositions, and oral histories show to the contrary. In fact, personnel from Camp Geiger, Onslow Beach, the Rifle Range, Camp Johnson, New River and Courthouse Bay were not confined to their respective areas. Rather, the historical sources demonstrate that they interacted extensively with the command, cultural, and industrial center of the base, chiefly located at Hadnot Point.

For my 12/7/24 Report and this rebuttal report, I obtained and reviewed oral histories, Congressional testimonies and depositions. I interviewed people such as MSgt. J. M. Ensminger USMC (Ret), who lived and worked on the base for over 11 years. His experience and relevant knowledge were critical for an understanding of daily life on the base. In addition, I communicated with Mr. Michael Partain. Mr. Partain published his Master's thesis⁶ on the history of the Camp Lejeune contaminated drinking water issues. He also for many years has maintained the nonprofit website known as "The Few, The Proud, the Forgotten," which has been a relevant resource and an online historical archive of relevant materials.

⁶ University of Central Florida, May 2021.

This publicly accessible nonprofit website for many years has included a historical event timeline with hyperlinks to official government documents. This is an important resource for purposes of understanding the history of the base. The timeline is titled: “Marine Corps Base Camp Lejeune chronology of significant events concerning contamination of the base drinking water supply. Part 1 1941 through October 1989.” It is identified as having been compiled by Mr. Partain and as having been last updated on March 10, 2012.⁷

In short, it appears that the Partain website provides a fair representation of the state of the general historical knowledge on the Camp Lejeune water contamination issue as of 2012. In fact, I am advised that the Government itself has produced documents in this case, from the Veterans Administration (“VA”), reflecting that the VA used excerpts from the Partain website to help teach and train its own subject matter experts with regard to Camp Lejeune VA claims several years ago. The VA directed its own experts to the Partain website as a reliable historical source.

The Partain website timeline would have shown the state of historical knowledge as of 2012 to any Government specialist who wanted to know. The website showed the known facts as of 2012 that the public historians on the contamination subject were then aware of. This raises questions as to whether all the documents now cited by Brigham in 2024 were not made available by the Government in the years past. It raises questions as to why all the information provided by the Government to Brigham today was not provided to Partain years ago. Again, the government’s own VA experts on Lejeune were relying on this very website for factual background.

The “Yale documents” corroborate this fact. The “Yale documents” are documents produced by the Government and the VA years ago in response to a FOIA request and lawsuit by various nonprofit groups.⁸ These VA documents reflect the use of subject matter experts retained by the VA to evaluate veterans’ claims including for cancers claimed to have been caused by Camp Lejeune water exposures. There are slide presentations where the VA presenters training these experts reference the Partain “The Few The Proud The Forgotten” website and the Lejeune documentary⁹ (about Partain and Ensminger and others) as relevant and credible sources to review. Below is an excerpt from a VA educational slideshow from 2012:

⁷ See https://tftptf.com/Misc/Timeline_Linked_March_2012.pdf.

⁸ *The Few, The Proud, The Forgotten v. United States Department of Veterans Affairs*, No. 3:16-cv-00647-VAB (D. Connecticut). The plaintiff nonprofit and other plaintiffs were represented by attorneys at Yale Law School’s Veterans Legal Services Clinic.

⁹ <https://semperfialwaysfaithful.com/>.

The Few, The Proud, The Forgotten

Website for Veterans, Family, etc.

The screenshot shows a web browser displaying the TFTPTF forum. The main header features the text "The Few, The Proud, The Forgotten" and the URL "www.tftptf.com". Below the header is a large image of the Marine Corps Eagle, Globe, and Anchor. The forum interface includes a navigation bar with links like "Board index", "FAQ", "Register", and "Login". The main content area displays a list of forums:

FORUM	TOPICS	POSTS	LAST POST
The Few, The Proud, The Forgotten General Discussion-Camp Lejeune Water Contamination	2045	9945	by unclebuzzkill Mon Nov 12, 2012 8:25 am
Betrayal of Trust & Honor Welcome to "Betrayal of Trust and Honor" forum. This forum is dedicated to discussing the historical facts concerning the Camp Lejeune water contamination. We ask that you remain on topic. Posts which deviate from the topic of this forum will be relocated to the main TFTPTF forum.	6	45	by homercampbell Mon Oct 01, 2012 8:56 am
Our Broken Federal Government Welcome to "Our Broken Federal Government" forum. This forum is dedicated to discussing the various transgressions of the Federal government which have allowed the Camp Lejeune water contamination and other issues to remain unresolved. We ask that you remain on topic. Posts which deviate from the topic of this forum will be relocated to the main TFTPTF forum.	21	126	by SgtRay Mon Oct 08, 2012 4:48 pm
Networking Looking for other TFTPTF members in your area?	97	395	by wgridley Sat Nov 03, 2012 3:42 pm

Documentary: <http://semperfialwaysfaithful.com/>

Excerpt from VA slideshow, 2012.

As can be seen, the slide has an image from the Partain website and cites the documentary. The last slide in the deck makes clear that this was information coming from the VA itself and which the Government itself was vouching for as reliable:

Questions?

(b) (6) [REDACTED]

Environmental Health Program
Post-Deployment Health
Office of Public Health
Veterans Health Administration
Department of Veterans Affairs
(202) 461-1020
(b) (6) [REDACTED]

<HTTP://WWW.PUBLICHEALTH.VA.GOV/EXPOSURES>



Excerpt from VA slideshow, 2012.

Another VA slide includes content again corroborating that the VA viewed the Partain website as a reliable source:

A screenshot of a computer screen displaying a webpage from TFTPTF.com. The page has a blue header with the URL "http://www.tftptf.com/" in yellow. Below the header, there's a banner with the text "Camp Lejeune Toxic Water" and "The Few, The Proud, The Forgotten". On the left, there's a sidebar with a menu including "Home", "Mission Statement", "MCBCL Timeline of Events", "Lejeune Registry Statistics", "Betrayal of Trust & Honor", "Joining TFTPTF", "Discussion Board", "Illness Registration", and "Photo Gallery". On the right, there's a large image of three screens showing water droplets, with the text "One law is signed by the President of t" above it. At the bottom, there's a banner with the text "SEMPER FI" and "ALWAYS FAITHFUL" over a background image of a soldier.

Excerpt from VA slideshow.

Both men (Ensminger and Partain) have testified extensively before Congress (11 times between the two of them) and have provided me with first-person accounts about life on the base from their own experiences and that of their families.¹⁰

Below is another image taken from one of the VA slide training presentations:



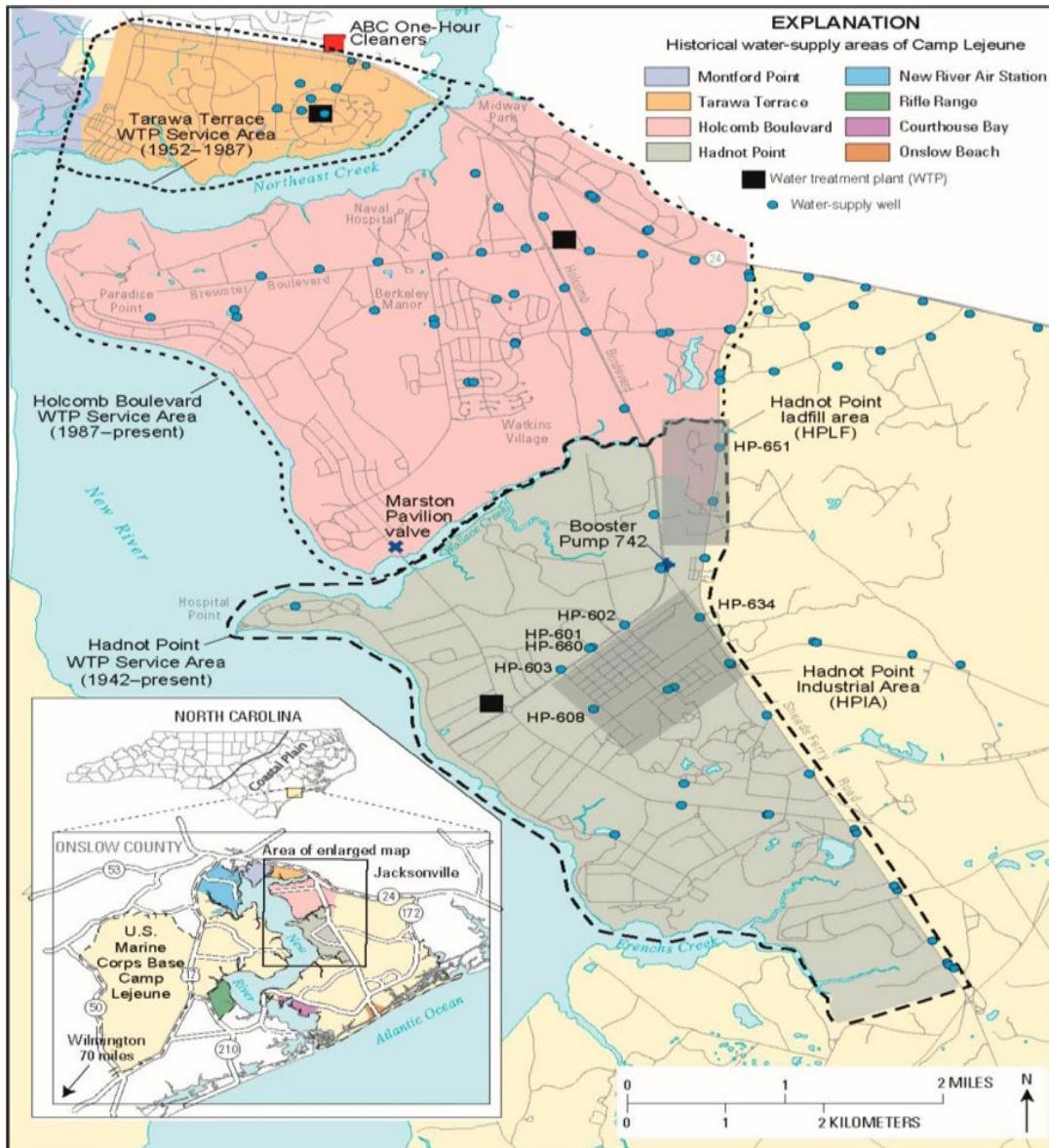
Excerpt from VA slideshow.

Mr. Ensminger and Mr. Partain, pictured above with President Barack Obama, were instrumental in the passage of the Janey Ensminger Act, which gives medical and other VA benefits to Camp Lejeune Marines and their families. They also were instrumental in advocating for the passage of the Camp Lejeune Justice Act.

¹⁰ See *id.*, Marine Corps Base Camp Lejeune chronology of significant events concerning contamination of the base drinking water supply, Part 1, 1941 through October 1989, compiled by Mike Partain for use by WWW.TFTPTC.COM. See also generally, Partain, Michael, "Camp Lejeune Digital Community Archive Project: An Analysis of Digital Public History Efforts to Achieve Social Justice for the Camp Lejeune Drinking Water Contamination 1999-2017" (2021). *Electronic Theses and Dissertations*, 2020-2023. 543. <https://stars.library.ucf.edu/etd2020/543>. See also Testimony of Michael Partain, https://republicans-science.house.gov/_cache/files/e/2/e2d4a1f2-d82e-45e9-b284-449754bf6aff/6917E476C613D3421FFAF940A8975922.091610-partain.pdf.

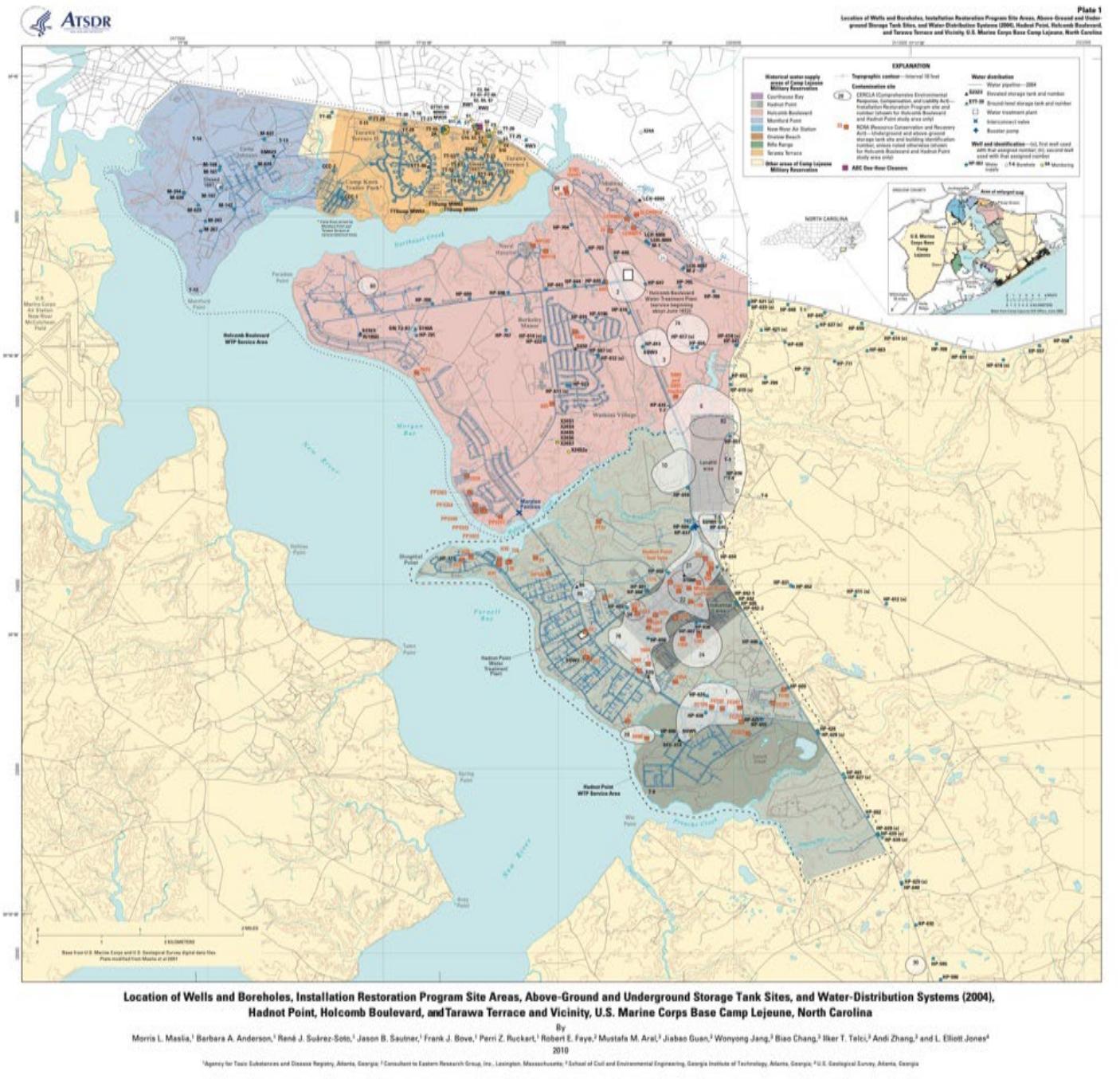
Yet even though the Government VA used the Partain website to provide relevant historical background for VA experts, the Brigham Report fails to cite it. The facts regarding the Partain website therefore help to highlight how the Brigham Report relies on selective information.

Another example of this pattern is this map image found in the report:



Map from Brigham Report, Page 11.

This image, culled from ATSDR publications, has conspicuously less information than other ATSDR maps and images Brigham omits. This fact is seen by comparing the image above to the more detailed image below:



Map from ATSDR publications.

The second map was not used in the Brigham Report. It illustrates in greater detail the relevant contamination sites identified aboard Camp Lejeune.

When one compares the two maps shown above, the version used by the Brigham Report omits many details, particularly related to the contaminated water sites. By comparison, the second map

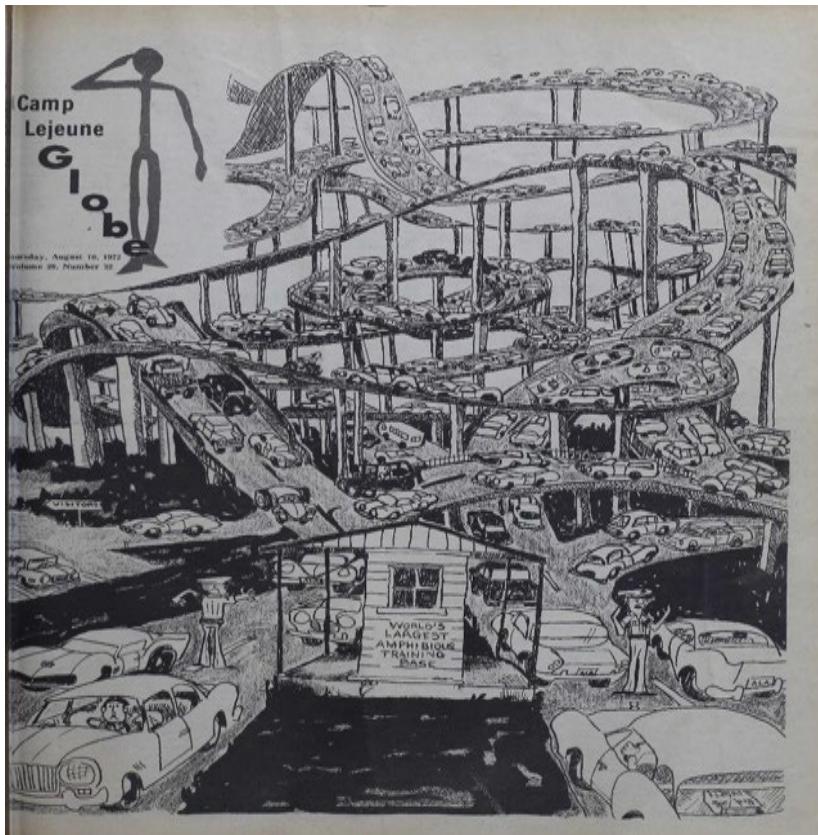
usefully illustrates the specific Installation Restoration (IR) source sites discovered by the Marine Corps' environmental remediation programs. The pattern is incomplete and one-sided information in the Brigham Report. This is a pattern repeated over and over again in the report.

As another example, the Brigham Report (see pages 86-87) discusses pools without considering important historical details of their use. Brigham does not explore the importance of the indoor Hadnot Point heated training pools including the Area 2 pool, the Area 5 pool, and the Montford/Johnson indoor pool. He does not acknowledge how these pools offered more than the facilities (such as they were) at other areas like Camp Geiger, Onslow Beach, Rifle Range, New River and Courthouse Bay.¹¹

A more complete reading of the *Globe* reveals that the main water survival training was conducted at Hadnot Point. There were competitions for intramurals, scuba training, water polo, and other contests and activities. Children and teenagers on the swim team, the Devil Fish, had practices and competitions in Hadnot Point's Area 2 and 5 pools. Children received swim training in the Hadnot pools. The pools at Tarawa Terrace and Paradise Point were also relevant as they were used by families. As evidenced in the *Globe*, the base pools were routinely opened for all personnel and their dependents when not being used for training. Families from elsewhere where facilities were lacking could travel to Hadnot Point to swim. The best facilities for water sports existed at Hadnot Point, drawing people from all over the base, something that the Brigham Report does not acknowledge despite the extensive documentary evidence.

As another example of selective use of evidence, Brigham cites a cartoon from the *Globe*:

¹¹ Former Camp Lejeune resident and public historian Ensminger recalled there were three indoor training pools aboard Camp Lejeune. These was the Area 2 indoor pool at Hadnot Point, the Area 5 indoor pool at Hadnot Point, and a third indoor swimming pool at Camp Johnson/Montford Point. All, at different times, were not just used for training, but were also open for recreational use, competitive swimming practices, and competitions. By contrast, outlying areas like Camp Geiger or the Rifle Range did not have any pools at all. (Ensminger interview/email).



Cartoon image from the *Globe*, found in Brigham Report.

The cartoon above is a humorous image of endlessly overcrowded roads entering and leaving the base. But Brigham, in focusing on the traffic, misses the main point of the *Globe* article content that goes with the image, which is that the Marines were developing Mainside, making the roads more accessible and building a dentist office and a hotel, among other things. It also ignores that traffic at the base entrance was only episodic, as civilian employees and others entered the base in the morning and left in the evening.

Further, in the past most Marines could not afford cars and would instead use buses (see 12/7/24 Report at page 16 discussing bus system and lack of cars). Thus, traffic was not an issue in getting to the Hadnot hub. Marines and their dependents during the period under review relied heavily on buses, which transported them free of charge around the base. These buses were recognizable as being green with white roofs¹² to reflect the sun and keep them cooler in the summers. Historical documents reflect that an assistant director of military passenger traffic for the Department of Defense, Captain C.V. Johnson, visited the base in September 1961 and was impressed by the bus system that brought people from areas such as Camp Geiger to Hadnot Point with great efficiency and convenience.¹³ Indeed, historical bus schedules reflect vigorous use of a network of buses:

¹² From Ensminger interview/email.

¹³ The *Globe*, 21 September 1961. I note that the area known or labeled for some purposes as "Hadnot Point" or sometimes, the "Hadnot Point Industrial Area," has also been labeled as, "Mainside" or the "Mainside Barracks area." See e.g. Naval Medical Center Camp Lejeune entry for "Mainside Branch" Medical Clinic (Building 15) at [Naval Medical Center Camp Lejeune > Branch Medical Clinics > Mainside Medical \(Building 15\)](#). And see map specifying the "Main Side C Store," at [Camp Lejeune Overview](#).

YOUTH ACTIVITIES BUS SCHEDULES

Buses will stop at scheduled stops only.

Youth Activity Buses will be designated as "Activities."

Students should be at the scheduled stops five minutes prior to the time indicated.

Youth Activities

Bus No. 10

Paradise Point to Tennis Courts, Golf Course, Marston Pavilion, Boat House, Area Club, Area 5 Pool, and Hobby Shop.

Block Pickup	Time
3300 3306 Cooper St.	0740
3300 3362 Pender St.	0741
3400 3412 Timmerman Ave.	0743
3200 3237 Eden St.	0746
3100 3131 Eden St.	0747
3000 3020 Eden St.	0749
2900 2922 Eden St.	0750
2900 2993 Cukela St.	0752
3000 3063 Cukela St.	0754

To: Tennis Courts, Golf Course, Marston Pavilion, Boat House, Area Club, Area 5 Pool, and Hobby Shop.

Bus No. 11

USNH and Paradise Point to Tennis Courts, Golf Course, Stone Street School, Marston Pavilion, Boat House, Area 2 Pool, Area Club, Area 5 Pool, and Hobby Shop.

Block Pickup	Time
USNH H-51	0735
USNH Surgeons Row	0737
2700 2731 Winston Rd.	0742
2700 Winston Rd. & Wavell St.	0744

To: Tennis Courts, Golf Course, Stone Street School, Marston Pavilion, Boat House, Area 2 Pool, Area Club, Area 5 Pool and Hobby Shop.

NOTE: Junior students living in the 2900, 3000, 3100, 3200, 3300 or 3400 blocks may board Bus No. 11 at Stone Street School at 0800 for transportation to the Area 2 Pool.

Bus No. 12

Paradise Point to Tennis Courts, Stone Street School, Marston Pavilion, Boat House, Area 2 Pool, Area Club, Area 5 Pool and Hobby Shop.

Block Pickup	Time
2500 2519 St. Mary's Dr.	0745
2400 2408 St. Mary's Dr.	0746
2300 2319 St. Mary's Dr.	0748
2200 2227 St. Mary's Dr.	0749
2100 2118 St. Mary's Dr.	0750
2000 Kent Rd. & Autumn Cir.	0751

To: Tennis Courts, Stone Street School, Marston Pavilion, Boat House, Area 2 Pool, Area Club, Area 5 Pool and Hobby Shop.

NOTE: Junior students living in the 2900, 3000, 3100, 3200, 3300 or 3400 blocks may board Bus No. 12 at Stone Street School at 0800 for transportation to the Area 2 Pool.

Buses No. 13 & 14
Berkeley Manor to Golf Course, Tennis

Courts, Stone Street School, Marston Pavilion, Boat House, Area 2 Pool, Area Club, Area 5 Pool and Hobby Shop.

Block Pickup	Time
5500 5520 Virginia St.	0735
5700 5702 Virginia St.	0737
5700 5715 Virginia St.	0739
5800 5844 Delaware Ave.	0741
5800 5800 Florida Ave.	0743
5500 5505 Maryland Ave.	0745

To: Golf Course, Tennis Courts, Stone Street School, Marston Pavilion, Boat House, Area 2 Pool, Area Club, Area 5 Pool and Hobby Shop.

Bus No. 15

Berkeley Manor to Golf Course, Tennis Courts, Stone Street School, Marston Pavilion, Boat House, Area 2 Pool, Area Club, Area 5 Pool and Hobby Shop.

Block Pickup	Time
5800 5836 Delaware Ave.	0740
5600 5684 Maryland Ave.	0742
5600 5629 Delaware Ave.	0744
5600 5609 Illinois Ave.	0746

To: Golf Course, Tennis Courts, Stone Street School, Marston Pavilion, Boat House, Area 2 Pool, Area Club, Area 5 Pool and Hobby Shop.

Bus No. 16

Berkeley Manor to Golf Course, Tennis Courts, Stone Street School, Marston Pavilion, Boat House, Area 2 Pool, Area Club, Area 5 Pool and Hobby Shop.

Block Pickup	Time
5100 5167 Delaware Ave.	0740
5200 5234 Alabama Ave.	0742
5200 5245 Alabama Ave.	0744
5100 5119 Alabama Ave.	0746
5300 5331 Florida Ave.	0748

To: Golf Course, Tennis Courts, Stone Street School, Marston Pavilion, Boat House, Area 2 Pool, Area Club, Area 5 Pool and Hobby Shop.

Bus No. 17

Midway Park to Tarawa Terrace School, via Knox Trailer Park.

Block Pickup	Time
1000 1038 Butler Dr.	0730
1600 1645 Butler Dr.	0732
1200 1200 Butler Dr.	0734
800 810 Butler Dr.	0736
300 308 Butler Dr.	0738
400 410 Butler Dr.	0740
700 700 Butler Dr.	0742

Knox Tr. Park 338 Toledo Rd 0800
Knox Tr. Park D-34 Wash House 0802
To: Tarawa Terrace School.

Bus No. 18

Tarawa Terrace I (E. Peleliu) to Tarawa Terrace School.

Block Pickup	Time
900 956 E Peleliu	0800
1000 1026 E. Peleliu	0802
1000 1070 E. Peleliu	0804

To: Tarawa Terrace School.

Bus No. 19

Knox Trailer Park, Tarawa Terrace I and II to Hobby Shop, Area 5 Pool, Area Club, Boat House, Marston Pavilion, Tennis Courts and Golf Course.

Block Pickup	Time
300 338 Toledo Rd.	0725
Raleigh Dr. D-34 Wash House	0727
2000 2012 Tarawa Blvd.	0732
2200 2202 Tarawa Blvd.	0734
2300 2362 Tarawa Blvd.	0736
2400 2444 Tarawa Blvd.	0737
200 221 Tarawa Blvd.	0739
100 187 Tarawa Blvd.	0741
100 137 Tarawa Blvd.	0743

MCAF BUS

MCAF and Geiger Trailer Park to Montford Point Swimming Pool, Tarawa Terrace School, Hobby Shop, Area 5 Pool, Area Club, Boat House, Marston Pavilion, Tennis Courts and Golf Course.

Block Pickup	Time
MOQ Area 2038 Telephone Booth	0710
Chapel Chapel Parking Lot	0715
Geiger TP Community Center	0720

To: Montford Point Pool, Tarawa Terrace School, Hobby Shop, Area 5 Pool, Area Club, Boat House, Marston Pavilion, Tennis Courts and Golf Course.

SHUTTLE SYSTEM

Tarawa Terrace School to Montford Point Pool — Monday through Friday.

Shuttle Buses — depart Tarawa Terrace for Montford Point at 0820.

Shuttle Buses — depart Tarawa Terrace for Montford Point at 0920.

Shuttle Buses — depart Montford Point for Tarawa Terrace at 0920.

Shuttle Buses — depart Tarawa Terrace for Montford Point at 1020.

Shuttle Buses — depart Montford Point for Tarawa Terrace at 1020.

Stone Street School to Area 2 Pool — Monday through Friday.

Shuttle Buses — depart Stone Street School for Area 2 Pool at 0920.

Shuttle Buses — depart Area 2 Pool for Stone Street School at 0920.

Shuttle Buses — depart Area 2 Pool for Stone Street School at 1020.

Shuttle Buses — depart Stone Street School for Area 2 Pool at 1020.

Golf Course to Hobby Shop via Tennis Courts, Marston Pavilion, Boat House, Area Club and Area 5 Pool.

Shuttle Buses — depart Golf Course for Hobby Shop at 0930.

Hobby Shop to Golf Course, via Area 5 Pool, Area Club, Boat House, Marston Pavilion and Tennis Courts.

Shuttle Buses — depart Hobby Shop for Golf Course at 0950.

RETURN TO QUARTERS

Return to quarters transportation will be accomplished over reverse routes of buses commencing at 1130. (Example: Students going to activities on Bus No. 10 will be picked up at the last activity in which they participated by Bus No. 10 and returned to quarters.)

Bus schedule, the *Globe*, 26 July 1962.

The Marine dependents relied on buses for school and in the summer months. I outlined this topic in detail at pages 16, 26, 28, and 29 of my 12/7/24 Report. The image above shows how extensive

and expansive the bus service was for the entire base in the summer months, including those supposedly isolated from Hadnot Point.

To further highlight the selectivity of the Brigham Report, there are other examples when the author uses the *Globe* to support his statement but ignores contextual evidence. Brigham cites the August 11, 1983 issue of the *Globe*, but omits that in the same issue, there were stories which reflected that people often traveled to Hadnot Point: a photo of a child participating at Marine family day (cover of issue); announcement of a new pool opened at Tarawa Terrace (p. 3); news of a drill competition at Goettge Field (p. 8); a feature on use of the main auto hobby shop (p. 17); a note of children's story time at the Base Library (p. 19); sports league results for football intramural season (p. 25); and an item on a regional golf championship at Paradise Point (p. 26).

The photo below from the same issue reflects how in 1983 more than 6,000 Marines and their dependents attended a concert at Hadnot Point by the Guess Who, a popular Canadian band:

10 *Globe*,
Aug. 11, 1983

Guess Who rocks socks off Camp Lejeune

*Canadian rock band
arouses rockers
with vintage hits*

*Story and photos
by Sgt. Phil Smith*

Liversedge Field overflowed with rock-n-rollers Aug. 2. Avid rock fans came together to listen to the sounds of the pioneering rock band of the 60s: The Guess Who.

AN ESTIMATED CROWD of 6,000 Marines and their families rocked the field with cheers as the veteran musicians highlighted their performance with vintage music from 15 gold records. The hour and a half concert was the second performance at Camp Lejeune this year brought to Marines courtesy of a major U.S. tobacco company. A June 4 show featured singer Cheryl Lynn and the rock band War.

Rain showers threatened much of the day, but when the Guess Who took the stage, the sky promised good weather. With half of the audience yet to arrive, the band opened their show to the up-tempo "Bus Rider."



Brian Tatarny leads the audience on with driving riffs

The *Globe*, 11 August 1983.

The story notes that it was second performance of the year sponsored by a particular sponsor (the earlier concert featured Cheryl Lynn and War on June 4), indicating how it was not uncommon on the base to have these events at Hadnot Point that had the best facilities for such large events.¹⁴

¹⁴ *The Globe*, 11 August 1983.

Thus, the Brigham Report uses the *Globe* as a source, but only in a narrow way to make an assertion and ignore the plethora of stories that support the fact that Marines and dependents' activities exposed them to contaminated water at places such as Hadnot Point and Tarawa Terrace.

The Brigham Report at page 104 cites a *Globe* article dated December 4, 1975 about a standpipe. However, the report omits reference to multiple other relevant stories in the same issue. For example, news included opportunities for GED classes at Hadnot Point; the Tarawa Terrace Kiddie College; intramural sports matches; advertising for the popular Turkey Bowl football game; and Camp Lejeune High School's 2A state football championship.¹⁵

Oral history and deposition sources highlight the incomplete nature of the research in the Brigham Report. For example, Mr. Partain recalls that his father lived in Tarawa Terrace II in the 1960s. His father instructed at the Radio School while also reporting to Hadnot Point.¹⁶

The same was true for Master Sergeant Ensminger, who lived both on base and off base for over eleven years. Over those years, Master Sergeant Ensminger and his family members spent time at multiple places on the base, including, the Tarawa Terrace housing area, the Tarawa Terrace and Hadnot swimming pools, the Hadnot Point areas for recreation, and the Hadnot Point hospital (at the "old" Naval hospital premises, later replaced by the new hospital that opened circa 1983).¹⁷

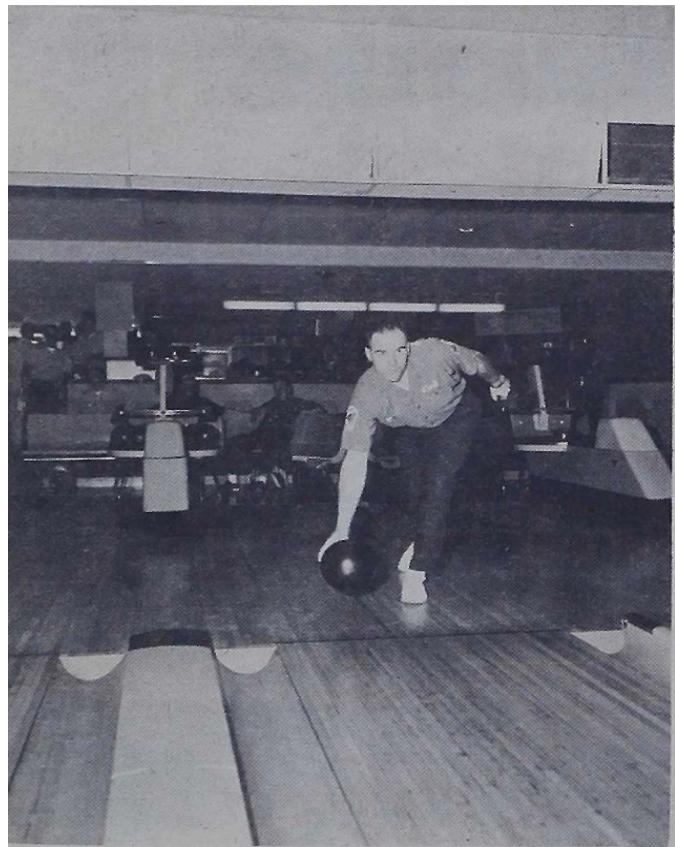
Service in the Marines required strenuous physical activity. Hadnot Point provided the most opportunities for exercise and conditioning. Hadnot Point had facilities for water survival training; intramural and semi-professional athletic competitions; weightlifting; swimming; and running. Thus when running became fashionable in the 1970s and 1980s, in order to train for races and marathons, many used the various facilities, relying on water fountains and gym showers. I outlined these activities at pages 14, 27, and 37-39 of my 12/7/24 Report.

Below is a photo of a person bowling at the Hadnot Point bowling alley, a massive multi-lane establishment that sold refreshments and hosted many people from all over the base for the popular sport at the time. Men and women gathered here to enjoy the sport and interact in leagues and intramurals. It was one of the most popular gathering places on base for many years:

¹⁵ The *Globe*, 4 December 1975.

¹⁶ Oral History by author via Zoom with Mike Partain, 7 January 2025.

¹⁷ From Ensminger communications/interview, including oral history interview by author via Zoom with Master Sergeant Jerry M. Ensminger, 7 January 2025. See <https://camp-lejeune.tricare.mil/About-Us> for more information on hospital.



The *Globe*, 30 April 1964.

Below is an image of one of the swimming competitions pitting the Devilfish youth team against the Fort Bragg team, at one of the heated indoor pools at Hadnot Point:



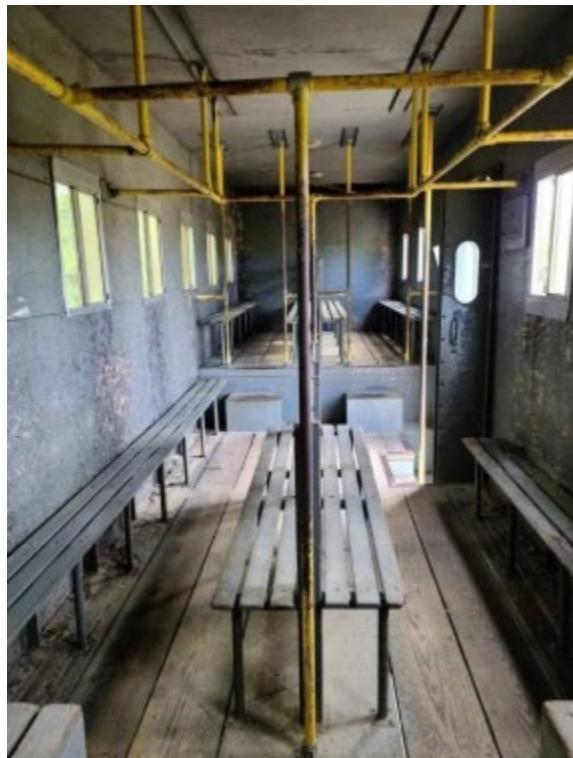
Devilfish dunk arch-rival Bragg

The *Globe*, 3 June 1965.

Those images reflect ordinary activities and facilities at Camp Lejeune where there was water obviously in use.

The Brigham Report portrays that groups such as the 8th Marine Regiment stayed in Camp Geiger once the 8th Marine Regiment was transferred there by the 1970s, remaining isolated from the remainder of the base and the contaminated water. (Brigham Report p. 64). However, this is another incomplete story. In fact, evidence from multiple sources reflects that the Marines in areas such as Camp Geiger traversed the base for training, including using facilities at Hadnot Point, where much of their machinery and weapons were serviced. Equally as important, the 8th Marine Regiment also cross-trained with the other regiments on the base, often at Hadnot Point.¹⁸

Brigham also omits mention of “cattle cars.” Historically, truck-drawn trailers, often called “cattle cars,” helped transport Marines around the base. The troops sat on benches, or stood and held onto poles, as in this demonstrative photo:¹⁹



Demonstrative photo of “cattle car.”²⁰

Marines piled into cattle cars to travel to Hadnot Point and elsewhere including for field maneuvers for weeks that included amphibious training. (*See* 12/7/24 Report, pages 30-36). Others relied on the “cattle cars” to transport them to work across the base. Personal accounts bear this out. For example, James Branham, Jr. lived in a barracks at Hadnot Point. He was a trained mechanic

¹⁸ See General Zinni deposition, regarding the 8th Marine Regiment.

¹⁹ Background on cattle cars was provided in Ensminger/Partain interviews/communications.

²⁰ https://www.reddit.com/r/USMC/comments/11w8u9s/i_bet_you_know_what_this_is/?rdt=60395.

working in the Hadnot Point industrial area off Sneads Ferry for the 2nd FSR Motor Pool a couple of miles away. He recounted how he rose at 5:30 am at his barracks at Mainside, showered, had breakfast at the mess hall, and then waited for a “cattle car” to pick him up and have him at work by 8 am. He worked at the motor pools doing repairs such as replacing brake shoes, oil changes, and steam cleaning. At 11 am, the “cattle trucks” picked him up and returned him to the mess hall until 1 pm when he returned to work. He worked until approximately 4:30 pm when he took the “cattle car” back to the barracks and showered to get the oil and grease off him before dinner, after a hard day’s work in the industrial area. He repeated the process throughout the week, highlighting the importance of the transportation system of “cattle cars” for the entire base that relied on them for movement from the outlying areas to Hadnot Point.²¹

These troops traveled on buses and “cattle cars” to Hadnot Point for intramurals, to attend boxing matches and football games, and for recreational activities such as bowling, golf, boating, and riding horses. Families used the buses to attend junior high and high school events including sports. In addition, they rode the bus to do shopping at the Main PX as evidenced by advertisements for the main exchange found within the *Globe*.

Below is an example highlighting how the Marines gathered for sports at Hadnot Point where they played, drank water, and could shower in local facilities after games. All the major groups including the 8th Marines had teams involved (the 8th Marines in the text below are listed as being fourth place at the time in the Red League):

INTRAMURAL FOOTBALL STANDINGS					H&SBn.	1	3	12	127
	W	L	PF	PA	MedBn.	0	4	14	104
Gold League					Red League	W	L	PF	PA
SupplyBn.	3	0	83	6	TankBn.	4	1	130	61
SuptBn.	3	1	90	38	MCAS	3	1	56	32
8thEngrBn.	3	1	70	55	CEB	3	1	54	18
MaintBn.	2	1	79	19	8th Mar.	2	1	76	64
HqBn. (MCB)	2	2	62	59	6th Mar.	2	2	65	38
LSB	2	2	50	31	HqBn.	2	2	54	69
MCSSS	2	2	33	39	AAVBN.	1	2	42	87
8thCommBn.	1	3	28	50	2d Mar.	1	3	22	90
					10th Mar.	0	3	24	40



The Engineers prepare to make a first down attempt.

The *Globe*, 10 October 1985

²¹ Deposition of James Claude Branham, Jr., 16 October 2024, 15-16, 18-20.

The Marines and relied on Hadnot Point for entertainment. There were few places to go off base due to the high costs of cabs to Jacksonville, which itself had very limited options. Meanwhile, there was much to do if one stayed on base. See pages 12-15 of my 12/7/24 Report discussing famous entertainers such as Frank Sinatra, Lou Rawls, and the Marine Corps Band coming to the base and drawing large crowds from across the base. Duke Ellington performed at the Hadnot Point SNCO Club in 1972 for \$6 per person.²² For big events, the Marines went to Hadnot Point.

Below is an advertisement in the *Globe* from January 1956:

The advertisement is a black and white clipping from The Globe newspaper. At the top, it features a graphic of three chevrons (ranks) above the word "STAFF CLUB". Below this, the main text details the schedule for the Staff Club at Hadnot Point. It includes dances on Friday and Saturday evenings, a special steak dinner on Sunday afternoon, and various other social activities like cocktail hours and fun nights. The text is organized into three distinct sections: Hadnot Point, Geiger, and Montford.

STAFF CLUB

AT HADNOT — Dance Friday from 8:30 p.m. until 12:30 a.m. with music by Jimmy West and his Tradewinds. Dance band Saturday, 8:30 p.m. until 12:30 a.m. Dance Sunday from 8:30 p.m. until 12:30 a.m. featuring Billy Tillis and the Versi-Tones. Special steak dinner Sunday for \$1. Sammy Audrain at the piano Sunday afternoon. Monday, cocktail hours from 7 p.m. until 9 p.m. Tuesday features Fun night at 8 p.m. and free drafts are served Wednesday at 7 p.m. Complete breakfasts served every day from 8 a.m. until 1 p.m.

AT GEIGER — Happy hours on Thursday from 4:30 p.m. until 6:30 p.m. Cocktail hours Sunday from 3 p.m. until 5 p.m.

AT MONTFORD — Fun night and Happy hours Wednesday night starting at 7 p.m.

The *Globe*, 20 January 1956

As shown, the Staff NCO Club at Hadnot Point hosted a dance on Friday and Saturday evenings with Jimmy West and His Tradewinds, while Billy Tillis and Versi-Tones played on Sunday evening with Sammy Audrain on the piano in the afternoon with a special steak dinner offered for

²² The *Globe*, 5 October 1972.

\$1. There were other offerings during the week including free drafts on Wednesday night and complete breakfast every day until 1 p.m. Meanwhile, Geiger only had Happy Hours on Thursday and cocktail hours on Sunday, lasting two hours.²³ There was even less at Montford Point.

The majority of Marines in combat units were under the age of 25 and not married, thus they wanted companionship beyond their everyday lives with other males.²⁴ This was the case all over the country where bars hosted lady's nights, fraternity parties occurred on college campuses, and other events that brought together the young. On the base, males outnumbered females. Once again, the *Globe* illustrates this point with many advertisements for events, socials, and other recreational activity on the base. It is also important to note that female Marines had barracks at Hadnot Point as did the Navy nurses and other personnel.

As outlined in my 12/7/24 Report (pages 11-16, 26-29, 37-39), Hadnot offered opportunities ranging from golf to boating and even equestrian events. It was the center of activity for everyone on base, not just those located in the Mainside barracks. People congregated at Hadnot for worship services, hospital visits (the outlying areas only had the equivalent of at the best an urgent care), shopping, banking, car care and there was an inn for visitors.

At Hadnot Point, the Main PX, per an article dated October 1981 in the *Globe*, served more than 23,000 customers each month.²⁵

Commissary closed for re-fit

Local military grocery shoppers should be prepared for some inconvenience for the next 12 days as the Hadnot Point main commissary store re-closed for renovation. As many shoppers likely know, the main store has been closed since Sunday and will not reopen for regular business Tuesday, Oct. 20, with several cosmetic im-mements.

The current renovation is part of an on-going re-fit that was contracted for several years ago. During the two weeks the Hadnot Point Commissary closed, construction workers will be installing new shelving and storage shelves, laying a new tile floor, updating the grocery item location markers and repainting and installing new produce display cases. The work is likely to cost somewhere in the neighborhood of \$100,000, according to Billy H. Waters, Camp Lejeune's Commissary Officer.

We want to provide better facilities at our com-

missary," he said in a telephone interview. "We are generally improving the appearance of the store and, in the long-run, we'll offer improved service to the patron and increase sales."

The Hadnot Point Commissary serves an average of 23,000 grocery customers each month, but steps have been taken to insure those people are not overly-burdened in shopping for food items. While the Hadnot Point face-lift is underway, shoppers are using other commissaries in the area.

"We've provided extra staff to help handle the over-flow at the Tarawa Terrace and Marine Corps Air Station stores," Waters said. "I'd like to emphasize that both of those stores are remaining open and will serve our customers during the time our Hadnot Point store is closed." As an added service, commissary officials indicated the Tarawa Terrace commissary will remain open Saturday, Oct. 10, when it would normally be closed for the Columbus Day national holiday.

²³ The *Globe*, 20 January 1956.

²⁴ Ensminger interview, 7 January 2025.

²⁵ The *Globe*, 8 October 1981. Available at <https://www.dvidshub.net/publication/issues/59545>.

The Globe, 8 October 1981.

Many of these people coming to the Hadnot Point Commissary came from areas such as Camp Geiger, Camp Johnson, Onslow Beach and Courthouse Bay. The selection of groceries, dry goods, and alcohol was significantly better at Hadnot. Most of the outlying PXs bore more of a resemblance to a 7-11, not a WalMart like the Main PX at Hadnot Point.²⁶

Schools were an important factor as well. The junior and high schools were centers of activity for the children and their families as well as community members who came to sporting events to support their community, go to school plays, and attend special events such as Halloween parties and dances. With one high and one junior high school, students from all of the family housing areas came from across the base to attend these schools which were at various times supplied with contaminated water. See pages 28-29 of my 12/7/24 Report. The kids and their parents also spent a lot of time at Hadnot Point for summer camps that included swimming, horseback riding, crafts, and playtime (also highlighted in my 12/7/24 Report). The Marine Corps wanted people active and engaged, hoping to ensure good times in the organization that helped with reenlistment, even in the period before the advent of the All-Volunteer Force.



MAKING THE ROUNDS — Lieutenant (junior grade) Carol Ceman, one of the 75 Navy nurses signed to the Naval Regional Medical Center, Camp Lejeune, N.C., looks in on Corporal Steven Hoff in the orthopedics section at the Center. (USMC photo by PFC Richard M. Butker)

The Globe, 11 May 1978.

As the above photo reflects, Hadnot Point was the location of doctors and nurses along with members of the Navy stationed at the base hospital. An epicenter of the base was the state-of-the-art Naval Hospital at Hadnot Point that I outlined at pages 15-16 of my 12/7/24 Report. Everyone on the base relied upon it for everything from medical check-ups to emergency and critical care to dental needs. It was a place where significant life events happened – births, major surgeries, deaths.

²⁶ Ensminger interview, 7 January 2025.

The hospital was widely used by base personnel and families. It was a perk for life on a military base that far exceeded what they generally had in life before the Marines. There are many personal stories that bear out its importance, and the centrality of the Hadnot Point hospital. Below is a photograph of oral historian Michael Partain's mother taken in her hospital room showing a glass of tap water along with his formula bottle with contaminated water. Mr. Partain's family lived on Hagaru Drive in the Tarawa Terrace housing area. The photo below is both poignant and significant: note the water glass and the infant formula bottle, both filled with Hadnot-supplied water, visible by the bedside of the young mother with the baby boy:



Photo from Mike Partain archives.

Others who passed through the hospital included Dr. Mike Gros. He joined the Navy to pay for medical school and became an Ob/Gyn stationed at Camp Lejeune in the early 1980s. Daily, he scrubbed his hands in hot water at the hospital, causing exposures to go along with those to water used at his residence very close to the hospital.²⁷ Later, he developed health issues, including cancer, after moving into private practice, just like Mr. Partain did years later after his family left the base. These first-person accounts highlight the human nature of the whole process of life on the base, including time at the hospital.

Other first-person accounts highlight the interconnectedness of the base. Terry Dyer remembers living at the base as a child and teenager with her parents at Camp Lejeune between 1958 and 1973. Her father worked on base as a school principal. Over the years, the family resided in homes located in the Tarawa Terrace community, including homes located on Bougainville Drive, Chosin Circle, and on Hagaru Drive.²⁸ Ms. Dyer lived a normal life with all of life's usual activities. She described family life including baths, showers, other bathroom uses, drinking water and other beverages at home and school, and eating lunch in the cafeteria at Tarawa Terrace II Elementary School, Brewster Junior High School, and Camp Lejeune High School.²⁹ She further remembered going to do summer recreation activities, most at Hadnot Point where she consumed large quantities of water during the hot, humid summers of coastal North Carolina.³⁰

²⁷ Mike Magner, *A Trust Betrayed: The Untold Story of Camp Lejeune and the Poisoning of Generations of Marines and Their Families* (DaCapo Press, 2014), 113-117.

²⁸ Video Deposition of Terry Dyer, 10 April 2024, 22-24.

²⁹ Dyer Deposition, 25-27, 48.

³⁰ Dyer Deposition, 56-59, 87-88, 151-154.

The same patterns of underreporting also plague the section of the Brigham Report on water buffaloes. Brigham goes into detail about the water buffaloes at pages 97-101. Then, he asserts that the standpipes used to fill them could be installed anywhere using underground water pipes and those existed not only at Mainside but also at other areas. He asserts that the travel times from Hadnot Point to other places on Camp Lejeune proximate to training activities would present significant problems to be overcome, and the permanency of the installation would be further reason for constructing standpipes in areas closer to training activities than Hadnot Point. However once again, his evidence is incomplete. He does not point to specific evidence of standpipes being used to fill water buffaloes outside of Hadnot. In fact, the historical shows that the Marines typically filled the water buffaloes at the Hadnot Point industrial area because of the water plant's size and capacity. It had standpipe equipment necessary to quickly fill the large trucks carrying many gallons of water. The Marines could fill the water buffaloes at Hadnot Point in 10-20 minutes. The water buffaloes filled at Hadnot Point were driven to deliver water widely, including going as far off as Bogue Field, halfway to the Cherry Point Marine Corps Air Station.³¹



Large and Tall Standpipe at Building 1400 at Hadnot Point
The *Globe*, 4 December 1975

³¹ Ensminger Oral History, 7 January 2025. *See also* information found at <https://www.stetson.edu/law/veterans/bogue-field.php>.



Smaller version of water station, Exhibit 9, David Greer Deposition.

The documentary evidence demonstrates that water buffaloes were critical to maintain proper hydration for training Marines. As I noted in my 12/7/24 Report at pages 30-36, the Marines used water buffaloes for both standard training and field maneuvers. This latter drilling occurred at least one week a month for most of the Marines, with increased frequency when a unit prepared for deployment aboard. Training included amphibious assault training on the beaches. According to General Anthony Zinni, UMSC (Ret) who served at Camp Lejeune multiple periods, Marines went out on maneuvers for up to weeks at a time and relied on the 2nd service support group based at the Hadnot Point industrial area to provide the water during the exercises. This was so no matter which regiment he commanded. This is important to note as other senior commanders likely followed similar patterns due to expediency at the Hadnot Point industrial area, and the Brigham Report offers no evidence to the contrary.³²

Other witnesses substantiate how Marines filled water buffaloes at Camp Lejeune. Colonel William Walters testified that he spent several years at Camp Lejeune in the late 1950s and then at nearby Bogue Field in the early 1960s. The latter, located between Camp Lejeune and Cherry Point (just over thirty miles away), was an auxiliary landing base that relied on water from the Hadnot Point industrial area standpipes according to Walters. A graduate of the Motor Transport School at Camp Johnson, he said the Marines from Bogue Field frequently used the standpipes at Hadnot Point.³³ The Marines, according to Colonel Walters, went to Hadnot Point because their officers wanted their work done quickly and water filled quickly at Hadnot. He stressed: "when you tell a driver or anybody else in those ranks this is where you go, they don't deviate."³⁴

³² Deposition of General Anthony Charles Zinni, 28 May 2024, 33-34. See also *the Globe*, 18 June 1981; *the Globe*, 15 October 1987.

³³ Deposition of Lt. Colonel William Walters, 20 May 2024, 49.

³⁴ Walters Deposition, 53.

The testimony highlights that the Marines relied heavily on getting their water from the Hadnot Point at Camp Lejeune because of its better facilities. They used the water from the water buffaloes for things like filling their canteens, using it for heating field rations, and for washing.

Finally, the Brigham Report at pages 24-33 discusses the topic of the opening date of ABC Cleaners. He describes that “in contrast to Mr. Melts’ 2001 testimony, a newspaper advertisement, a high school yearbook, telephone directories, and other documents support … that the ABC One-Hour Cleaners … opened in June 1954.” First, it appears that there are materials cited by Brigham that were not provided by the government in the past to investigating agencies or historian researchers like Michael Partain. (See “The Few, The Proud” timeline dated 2012). Second, the Melts Deposition (cited in the Timeline) reflects the owner Mr. Melts’ testimony that put the opening date in 1953. This evidence refutes Brigham’s arguments for 1954. More specifically, throughout his deposition, Mr. Melts’ testimony confirmed that the ABC cleaners began operation in 1953 at 2127 Lejeune Boulevard and operated in the same location ever since he opened it in 1953; that he worked with his brother who also worked in the business prior to his death; that he obtained the PCE chemical and used it ever since he began operations in 1953; and that as far as he knew it was not diluted but 100% pure PCE.³⁵ Government agencies were aware in the past that historians like Mr. Partain believed the Melts deposition and the 1953 start date as evidenced by 2012 “The Few, the Proud” Timeline. Yet apparently the government took no steps to share the information they now share with their expert Brigham today for litigation purposes.

In conclusion, I would say that the Brigham Report does have some good historical sections such as regarding the original building of the camp, based primarily on secondary sources written by the Marines, although the pertinence of that part of the narrative is unclear. However, the majority of the report lacks primary research, especially use of first-person accounts and ignores many sources such as command chronologies, the *Globe* newspaper, and back copies of *Leatherneck* magazine that illustrate all aspects of life on the base. The Brigham Report is incomplete in many areas, inferring people lived isolated lives in outlying areas, which is misleading. It provides little primary research such as oral histories to substantiate its assertions and fails to go into detail about life on the base and peoples’ interaction with water. By contrast, in my 12/7/24 Report and here, I have sought to use many sources to show a fuller picture of the life at the base.

³⁵ See Victor Melts’ deposition, April 12, 2001, at pp. 2-5; 7; 11; 13; 24; 37.

Dated: 13 January 2025

Signed: Kyle Longley
Kyle Longley

RELIANCE LIST FOR REBUTTAL REPORT

1. Issue of *Leatherneck* dated April 1955.³⁶
2. Oral history notes/email, reflecting discussions/communications with retired Master Sergeant J.M. Ensminger (USMC, Ret.).
3. Oral history notes from discussions with Mr. Michael Partain.
4. Testimony of Partain (1).³⁷
5. Testimony of Partain (2).³⁸
6. Nonprofit website, “The Few, The Proud, the Forgotten.”³⁹
7. Mike Partain's TFTPTF Timeline (1941-1989) Updated 03.10.12.⁴⁰
8. “Yale” documents reflecting VA use of Partain website.
9. Partain, Michael, Thesis, "Camp Lejeune Digital Community Archive Project: An Analysis of Digital Public History Efforts to Achieve Social Justice for the Camp Lejeune Drinking Water Contamination 1999-2017" (University of Central Florida, May 2021). *Electronic Theses and Dissertations, 2020-2023.*⁴¹
10. ATSDR Hadnot Point map.⁴²
11. The Camp Lejeune *Globe*, 10 August 1972.⁴³
12. The Camp Lejeune *Globe*, 21 September 1961.⁴⁴
13. Naval Medical Center Camp Lejeune entry for “Mainside Branch” Medical Clinic (Building 15).⁴⁵
14. Map specifying the “Main Side C Store.”⁴⁶

³⁶ issue available at https://archive.org/details/sim_leatherneck_1955-04_38_4

³⁷ https://republicans-science.house.gov/_cache/files/e/2/e2d4a1f2-d82e-45e9-b284-449754bf6aff/6917E476C613D3421FFAF940A8975922.091610-partain.pdf

³⁸ <https://www.veterans.senate.gov/services/files/071BA053-6068-4305-9337-5243828435C4>

³⁹ <https://www.tftptf.com/>

⁴⁰ <https://www.tftptf.com/5873.html>

⁴¹ <https://stars.library.ucf.edu/etd2020/543/>

⁴² https://www.atsdr.cdc.gov/camp-lejeune/media/pdfs/2024/10/masterplate_hadnotpoint.pdf

⁴³ <https://www.dvidshub.net/publication/issues/60724>

⁴⁴ <https://www.dvidshub.net/publication/issues/61751>

⁴⁵ <https://camp-lejeune.tricare.mil/Branch-Medical-Clinics>

⁴⁶ https://www.mcieast.marines.mil/portals/33/documents/contracting/contracting_map.pdf

15. Photo of “Main Side C-Store” from Base Exterior Architectural Plan (BEAP), Marine Corps Base (MCB) Camp Lejeune and Marine Corps Air Station (MCAS) New River.⁴⁷
16. The Camp Lejeune *Globe*, 26 July 1962.⁴⁸
17. The Camp Lejeune *Globe*, 11 August 1983.⁴⁹
18. The Camp Lejeune *Globe*, 4 December 1975.⁵⁰
19. The Camp Lejeune *Globe*, 30 April 1964.⁵¹
20. The Camp Lejeune *Globe*, 3 June 1965.⁵²
21. The Camp Lejeune *Globe*, 10 October 1985.⁵³
22. The Camp Lejeune *Globe*, 5 October 1972.⁵⁴
23. The Camp Lejeune *Globe*, 20 January 1956.⁵⁵
24. The Camp Lejeune *Globe*, 8 October 1981.⁵⁶
25. The Camp Lejeune *Globe*, 11 May 1978.⁵⁷
26. Photo from Mike Partain archives.⁵⁸
27. Dr. Mike Gros – Mike Magner, *A Trust Betrayed: The Untold Story of Camp Lejeune and the Poisoning of Generations of Marines and Their Families* (DaCapo Press, 2014), 113-117.
28. Deposition of Terry Dyer, 10 April 2024 (previously produced).
29. Stetson University Bogue Field project, <https://www.stetson.edu/law/veterans/bogue-field.php>.
30. Exhibit 9 from David Greer Deposition (previously produced).

⁴⁷ <https://www.lejeune.marines.mil/Portals/27/Documents/EMD/Cultural-Resources/BEAP.pdf>

⁴⁸ <https://www.dvidshub.net/publication/issues/61612>

⁴⁹ <https://www.dvidshub.net/publication/issues/59319>

⁵⁰ <https://www.dvidshub.net/publication/issues/60210>

⁵¹ <https://www.dvidshub.net/publication/issues/61312>

⁵² <https://www.dvidshub.net/publication/issues/61241>

⁵³ <https://www.dvidshub.net/publication/issues/58953>

⁵⁴ <https://www.dvidshub.net/publication/issues/60716>

⁵⁵ <https://www.dvidshub.net/publication/issues/62469>

⁵⁶ <https://www.dvidshub.net/publication/issues/59545>

⁵⁷ <https://www.dvidshub.net/publication/issues/59993>

⁵⁸ Copy available at <https://www.ucf.edu/news/ucf-history-grad-helps-secure-justice-for-military-families-exposed-to-toxic-water/>

31. Deposition of General Anthony Charles Zinni, 28 May 2024 (previously produced).
32. *The Globe*, 18 June 1981.⁵⁹
33. *The Globe*, 15 October 1987.⁶⁰
34. Deposition of Lt. Colonel William Walters, 20 May 2024 (previously produced).
35. Deposition of James Claude Branham, Jr., Salisbury, North Carolina, 16 October 2024.
36. Demonstrative photo of “cattle car.”⁶¹

⁵⁹ <https://www.dvidshub.net/publication/issues/59564>

⁶⁰ <https://www.dvidshub.net/publication/issues/58564>

⁶¹ https://www.reddit.com/r/USMC/comments/11w8u9s/i_bet_you_know_what_this_is/?rdt=60395.